



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

August 27, 2019

**BY ECF**

The Honorable J. Paul Oetken  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *United States v. Russ Gerson,*  
17 Cr. 708 (JPO)

Dear Judge Oetken:

The Government respectfully writes in response to the defendant's request to travel internationally from August 27, 2019 through August 30, 2019. In that letter, the Government was reported to take no position. Although that is the position relayed to defense counsel, since that time, and after further internal discussions, the Government has significant concerns about the defendant's international travel six weeks before his scheduled surrender date of October 15, 2019. Specifically, the Government is concerned that the defendant has a strong incentive to flee and not to serve his jail sentence. Accordingly, the Government opposes the travel request and will oppose any future requests for international travel before the defendant's approaching surrender date.

Respectfully submitted,

GEOFFREY S. BERMAN  
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cc: (by ECF)  
Julia Gatto, Esq.